IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: : CHAPTER 13

Thomas E. Sloan

Judyth A. Sloan :

: BANKRUPTCY NO.: 19-11196-elf

NOTICE OF MOTION, RESPONSE DEADLINE AND HEARING DATE

Thomas E. Sloan and Judyth A. Sloan (the "Debtors") have filed a Motion to Reopen Case for the Limited Purpose of Avoiding Judicial Liens.

<u>Your rights may be affected</u>. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney).

- 1. If you do not want the court to grant the relief sought in the Motion or if you want the court to consider your views on the Motion, then on or before **January 16, 2023**, you or your attorney must do <u>all</u> of the following:
 - (a) File an answer explaining your position with the Clerk's office:

Robert N.C. Nix Sr. Federal Courthouse 900 Market Street, Suite 400 Philadelphia, PA 19107

If you mail your answer to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

(b) Mail a copy to the movant's attorney:

Erik B. Jensen, Esquire Jensen Bagnato, P.C. 1500 Walnut Street, Suite 1510 Philadelphia, PA 19102 Telephone: (215) 546-4700

- 2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the court may enter an order granting the relief requested in the motion. A hearing on the motion is scheduled to be held before the Honorable Eric L Frank, on **February 7, 2023 at 1 p.m.** in Courtroom #1, United States Bankruptcy Court for the Eastern District of Pennsylvania, Robert N.C. Nix Sr. Federal Courthouse, 900 Market Street, Philadelphia, PA 19107.
- 3. If a copy of the Motion is not enclosed, a copy of the Motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).

4. You may contact the Bankruptcy Clerk's office at (215) 408-2800 to find out whether the hearing has been canceled because no one file an answer.

Dated: January 3, 2023 **JENSEN BAGNATO, P.C.**

By: /s/ Eric L. Frank

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Counsel to the Debtor